

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

IN RE: ANADARKO PETROLEUM
CORPORATION SECURITIES
LITIGATION

Case No. 4:20-cv-576

District Judge Charles R. Eskridge III

CLASS ACTION

**JOINT MOTION FOR LEAVE TO FILE SUMMARY JUDGMENT BRIEF AND
EXHIBITS TO SUMMARY JUDGMENT AND DAUBERT BRIEFS UNDER
INTERIM SEAL**

The Parties¹ hereby jointly move for the Court's approval to file Defendants' summary judgment brief and the exhibits to the summary judgment brief and the Parties' *Daubert* briefs, under interim seal pursuant to the procedures set forth below.

WHEREAS, on February 16, 2023, this Court entered the Parties' Amended Scheduling and Docket Control Order (ECF No. 150) ("Scheduling Order"), which set forth the following deadlines regarding summary judgment and *Daubert* briefing:

¹ The Parties refer to Class Representatives Norfolk County Council as Administering Authority of the Norfolk Pension Fund and Iron Workers Local #580 Joint Funds, on behalf of themselves and the Class (collectively, "Plaintiffs"), and defendants Anadarko Petroleum Corporation, R.A. Walker, Robert G. Gwin, Robert P. Daniels, and Ernest A. Leyendecker, III (collectively, "Defendants").

- a. March 16, 2023 – Motions Deadline (except motions *in limine*)
- b. April 20, 2023 – Deadline for Oppositions
- c. May 11, 2023 – Deadline for Replies;

WHEREAS, the Protective Order entered in this action states that “[i]f Protected Material is to be included in any papers filed with the Court, such papers shall be . . . filed under seal in accordance with the Court’s Local Rules and CM/ECF procedures” (ECF No. 80 ¶ 13.3);

WHEREAS, because of the large number of exhibits that must be reviewed for “Protected Material” in these filings, Defendants believe a modification of the procedures set forth in Section 12(b) of Your Honor’s Court Procedures would be beneficial to allow adequate time to review and propose any appropriate redactions;

NOW, THEREFORE, the Parties hereby stipulate and agree to the following proposed process for submitting proposed sealing and redactions for summary judgment and *Daubert* briefing to the Court, and jointly request that the Court order as follows:

- 1. The party filing the motion will file their papers under interim seal by the deadlines set forth above pursuant to the Scheduling Order;
- 2. The party filing the motion will serve unredacted papers on the other party by the deadlines set forth above pursuant to the Scheduling Order;
- 3. The parties will then have the opportunity to redact the papers and exhibits, and the party filing the motion will transmit proposed redactions to the other

party within two (2) weeks of the deadlines set forth above pursuant to the Scheduling Order;

4. Within three (3) weeks of the deadlines set forth above pursuant to the Scheduling Order, the party moving to seal will file a motion to seal attaching proposed redacted copies, pursuant to the procedure outlined in Section 12(b) of Your Honor's Court Procedures. The motion will include the redaction justifications of moving party.

Dated: March 16, 2023

Respectfully submitted,

/s Kevin J. Orsini

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CERTIFICATION OF WORD COUNT

In accordance with Rule 18(c) of Your Honor's Court Procedures, I hereby certify that this document contains 429 words, exclusive of the caption and the signature block.

Dated: March 16, 2023

/s/ Kevin J. Orsini

Kevin Orsini

CERTIFICATE OF SERVICE

I certify that on March 16, 2023, I caused a true and correct copy of the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system. Notice of this filing will be sent to counsel of record by operation of the Court's electronic filing system.

Dated: March 16, 2023

/s/ Kevin J. Orsini

Kevin Orsini